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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding no.	91252855
Party	Defendant Complete Clothing Company
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Date	05/11/2022
Attachments	Willow Motion.pdf(133796 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Spooky Girl, Inc., Opposer, v. Complete Clothing Company, Applicant.	Opposition No. 91252855 (parent) Opposition No. 91255018 Serial No. 88/303,957 Mark: WILLOW Serial No. 88/668,023 W I L L O W Mark: 
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**JOINT MOTION TO AMEND APPLICATIONS AND TO WITHDRAW OPPOSITIONS
CONDITIONED UPON APPROVAL AND ENTRY OF AMENDMENTS**

Applicant Complete Clothing Company (“Applicant”) and Opposer Spooky Girl, Inc. (“Opposer”) jointly move as follows:

1. Amendment of Application Serial No. 88/303,957 by Complete Clothing Company, Inc.

Pursuant to 37 C.F.R. § 2.133, Applicant requests amendment of the listing of goods in its application for the mark WILLOW, Serial No. 88/303,957, to be amended as follows:

FROM the existing:

Bottoms as clothing; Dresses; Footwear; Gloves; Headwear; Jackets; Jeans;
Lingerie; Pants; Scarves; Shirts; Sweaters; Tops as clothing; T-shirts

TO (additions underlined and bolded):

Bottoms as clothing; Dresses; Footwear; Gloves; Headwear; Jackets; Jeans;
Lingerie; Pants; Scarves; Shirts; Sweaters; Tops as clothing; T-shirts; **none of the**

**aforementioned directed towards the music, motion picture, television, or
other media industries**

The proposed amendment does not alter the mark. The proposed amendment does not materially add to the identification of the goods, and is principally intended to narrow the goods from the original identification, as shown above. Accordingly, the proposed amendment does not amend the application in “substance” under 37 C.F.R. § 2.133(a).

For the foregoing reasons, the parties respectfully request that the Board grant the proposed amendment.

**2. Amendment of Application Serial No. 88/668,023 by Complete Clothing
Company, Inc.**

Pursuant to 37 C.F.R. § 2.133, Applicant requests amendment of the listing of

W I L L O W

Goods in its application for the mark , Serial No.

88/668,023, to be amended as follows:

FROM the existing:

Bottoms as clothing; Dresses; Footwear; Gloves; Headwear; Jackets; Jeans;

Lingerie; Pants; Scarves; Shirts; Sweaters; Tops as clothing; T-shirts

TO (additions underlined and bolded):

Bottoms as clothing; Dresses; Footwear; Gloves; Headwear; Jackets; Jeans;

Lingerie; Pants; Scarves; Shirts; Sweaters; Tops as clothing; T-shirts; **none of the**

**aforementioned directed towards the music, motion picture, television, or
other media industries**

The proposed amendment does not alter the mark. The proposed amendment does not materially add to the identification of the goods, and is principally intended to narrow the goods from the original identification, as shown above. Accordingly, the proposed amendment does not amend the application in “substance” under 37 C.F.R. § 2.133(a).

For the foregoing reasons, the parties respectfully request that the Board grant the proposed amendments.

3. Request for Dismissal of Opposition With Prejudice

After and conditioned on approval and entry of the above amendments to the opposed applications by the Board, Opposer requests, and Applicant consents to, withdrawal of the captioned Oppositions with prejudice.

Dated: May 11, 2022

By: /s/ Philip Nulud
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is one of the attorneys for Applicant Complete Clothing Company, in the above-captioned Opposition proceeding and that on the date which appears below, he caused a copy of the foregoing **JOINT MOTION TO AMEND APPLICATIONS AND TO WITHDRAW OPPOSITIONS CONDITIONED UPON APPROVAL AND ENTRY OF AMENDMENTS** to be served on Jill Pietrini, counsel for Opposer, by forwarding said copy via email to:

Jill Pietrini, Benjamin Aigboboh
jpietrini@smrh.com; baigboboh@sheppardmullin.com
1901 Ave of the Stars, Suite 1600
Los Angeles, CA 90067

Dated: May 11, 2022

By: /s/ Philip Nulud
Philip Nulud